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Attorneys for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In Re:	:	Case No.: 18-16461 VFP
	:	Chapter: 13
ELVA SALGADO aka	:	Hon:
ELVA L. SALGADO	:	
	:	
	:	
Debtors.	:	Hearing Date:
	:	
	:	

RESPONSE TO NOTICE OF OBJECTION OF BANK OF AMERICA, N.A.

Antonio R. Espinosa, of full age certifies:

1. I am the attorney for the Debtor.
2. I have personal knowledge of the facts set forth herein.
3. I make this Response to the objection which has been filed by Bank of America, N.A. (B of A)

4. B of A holds a mortgage on debtor's property located at 626-632 Maple Avenue, Elizabeth, New Jersey.

5. Debtor is in arrears.
6. Debtor proposes to modify the loan.
7. Debtor has applied for a loan modification and is making adequate protection payments.

8. The Plan is conditional upon the loan modification approval

I hereby certify that the foregoing statements made by me are true. I am aware if any of the foregoing statements made by me is willfully false, I am subject to punishment.

Dated: June 20, 2018

/s/Antonio R. Espinosa
ANTONIO R. ESPINOSA, ESQ.